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*Counsel for the Debtors and  
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	)	
In re:	)	Case No. 12-12020 (MG)
	)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	)	Chapter 11
	)	
Debtors.	)	Jointly Administered
_____	)	

**PROPOSED AGENDA FOR MATTERS SCHEDULED  
TO BE HEARD ON APRIL 11, 2013 AT 11:30 A.M. (EST)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,  
Alexander Hamilton U.S. Custom House, Courtroom 501, One Bowling Green, New York, NY  
10004-1408

**I. CONTESTED MATTERS**

1. Motion of the Official Committee of Unsecured Creditors to Preclude the Debtors from Offering Any Evidence of Their Reliance on Counsel for Advice Concerning the Evaluation, Negotiation or Approval of the RMBS Settlement [Docket No. 2906]

**Related Documents:**

- a. Application of the Official Committee of Unsecured Creditors Pursuant to 11 U.S.C. § 107(b) and Rule 9018 of the Federal Rules of Bankruptcy Procedure to File Motion of the Official Committee of Unsecured Creditors to Preclude the Debtors from Offering Any Evidence of Their Reliance on Counsel for Advice Concerning the Evaluation, Negotiation or Approval of the RMBS Settlement Under Seal [Docket No. 2905]

- b.** Notice of Motion of the Official Committee of Unsecured Creditors to Preclude the Debtors from Offering Any Evidence of Their Reliance on Counsel for Advice Concerning the Evaluation, Negotiation or Approval of the RMBS Settlement [Docket No. 2910]
- c.** Order Rescheduling Hearing on Creditors Committee Motion to Preclude Evidence at Trial [Docket No. 2973]
- d.** Declaration of LaShann M. DeArcy in Further Support of Debtors' Opposition to Creditors' Committee's Motion to Preclude Evidence of Reliance on Counsel Regarding the RMBS Settlement [Docket No. 2982]
- e.** Order signed on 3/5/2013 Granting Application of the Official Committee of Unsecured Creditors Pursuant to 11 U.S.C. § 107(b) and Rule 9018 of the Federal Rules of Bankruptcy Procedure to File Motion of the Official Committee of Unsecured Creditors to Preclude the Debtors from Offering Any Evidence of Their Reliance on Counsel for Advice Concerning the Evaluation, Negotiation or Approval of the RMBS Settlement UNDER SEAL [Docket No. 3105]
- f.** Fifth Revised Joint Omnibus Scheduling Order, signed on 3/25/2013, and Provisions for Other Relief Regarding Debtor's Motion for Approval of RMBS Trust Settlement Agreements [Docket No. 3306]

**Responses:**

- a.** Joinder of MBIA Insurance Corporation to the Motion of the Official Committee of Unsecured Creditors to Preclude the Debtors from Offering Any Evidence of Their Reliance on Counsel for Advice Concerning the Evaluation, Negotiation or Approval of the RMBS Settlement [Docket No. 2931]
- b.** Joinder Of Financial Guaranty Insurance Company In Support Of The Motion Of The Official Committee Of Unsecured Creditors To Preclude The Debtors From Offering Any Evidence Of Their Reliance On Counsel For Advice Concerning The Evaluation, Negotiation Or Approval Of The RMBS Settlement [Docket No. 2932]
- c.** Opposition to Creditors' Committee's Motion to Preclude Evidence of Reliance on Counsel Regarding the RMBS Settlement [Docket No. 2984]
- d.** Joinder of Wilmington Trust, N.A. in Support of the Motion of The Official Committee of Unsecured Creditors to Preclude the Debtors from Offering Any Evidence of Their Reliance on Counsel for Advice Concerning the Evaluation, Negotiation or Approval of the RMBS Settlement [Docket No. 2983]

**Replies:**

- a.** Reply of the Official Committee of Unsecured Creditors in Further Support of Its Motion to Preclude Evidence of the Debtors' Reliance on Advice of Counsel in Connection with the RMBS Settlement [Docket No. 3025]

**Status:** The hearing on this matter will be going forward.

Dated: April 9, 2013  
New York, New York

/s/ Gary S. Lee  
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